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Attorneys for Defendant
RANDALL STEVEN CURTIS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

“AMY,” *et al.*,

Plaintiffs,

RANDALL STEVEN CURTIS,

Defendant.

Case No. 19 Cv 2184 PJH

DECLARATION OF ALEXANDRA ROYBAL
IN SUPPORT OF DEFENDANT CURTIS’S
MOTION FOR JUDGMENT ON THE
PLEADINGS, SUMMARY JUDGMENT,
AND/OR PARTIAL SUMMARY JUDGMENT

Date: February 25, 2021

Time: 1:30 p.m.

Trial: June 21, 2021

Before the Honorable Phyllis J. Hamilton
Senior United States District Judge

1 I, ETHAN A. BALOGH, declare under penalty of perjury as follows:

2 1. I am a paralegal at Maxwell Law, PC, and my firm works regularly with the law firm
3 of Coleman & Balogh LLP. In this case, Ethan A. Balogh provided to me lists of judgments that
4 I am informed and believe constitute part of the discovery from this case, as well as discovery
5 from the prior Northern District of California case captioned *United States v. Curtis*, 16 Cr. 510
6 SI. Attached hereto as Exhibit A is a true and correct copy of the discovery materials Mr. Balogh
7 asked me to assess.

8 2. After receiving these materials, I searched the federal PACER database for each
9 applicable court case reflected on Exhibit A to determine the amounts of restitution awarded in
10 those matters to persons identified either by (a) the same pseudonyms Plaintiffs have adopted in
11 this matter, with one exception I discuss next, or (b) the same pornography series name that I am
12 informed and believe Plaintiffs link to those pseudonyms. The one exception is that in addition to
13 researching and calculating restitution awards made to Lily, Mr. Balogh told me that she is the
14 same person who used to proceed by the pseudonym Vicky, and I should treat them as one
15 individual, which I thereafter did. Attached hereto as Exhibit B is a true and correct copy of the
16 spreadsheets I have prepared by which I researched and then set forth the restitution awards made
17 in the listed cases, and then tabulated them. My calculations reflect that Lily (aka Vicky) has
18 received restitution awards exceeding \$15 million, Sarah has received restitution awards
19 exceeding \$2.8 million, the "Sweet Sugar" series, which am I informed by counsel is Mya and
20 Pia, have received restitution awards exceeding \$575,000, and Violet has received restitution
21 awards exceeding \$590,000.

22 I declare that the foregoing is true and correct under penalty of perjury under the laws of
23 the United States.

24 Dated: February 5, 2021


ALEXANDRA ROYBAL